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September 17, 2010

Hon. I. Leo Glasser
United States District Judge
225 Cadman Plaza East
Brooklyn, New York
11201

Re: United States v. Yakovlev, 09 CR. 587 (S-1) (ILG)

Dear Judge Glasser;

I am writing with the consent of all parties to advise the Court that the current trial date of October 25, 2010, cannot realistically be met. Recently, the government disclosed the existence of over 25 potential *Brady* witnesses, many of whom are in Russia, and has yet to complete an array of scientific tests that are critical to the overall case. Once these tests have been completed and their results disclosed, the defense will undoubtedly need to independently corroborate the results with its own analysis. Accordingly, the current trial date is unrealistic.

I respectfully suggest that we discuss a more realistic trial date on our next appearance on October 8, 2020. By then, hopefully, some of these issues may be clarified.

Thank you for your consideration of this application.

Respectfully submitted

Michael H. Gold